

Exhibit A

Subject: FW: Preliminary list of issues for defendants' Monday's submission

From: "Bennett, Edward" <EBennett@wc.com>
Date: November 3, 2012 10:13:45 AM PDT
To: Richard Schirtzer <richardschirtzer@quinnemanuel.com>
Subject: RE: Preliminary list of issues for defendants' Monday's submission

Richard - #1 refers to defendants' intention to ask the Court to compel production of relevant documents FHFA has refused to produce on the basis of whether they reside within the "pls" or "whole loan" businesses.

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From: Richard Schirtzer [<mailto:richardschirtzer@quinnemanuel.com>]
Sent: Saturday, November 03, 2012 12:00 AM
To: Bennett, Edward
Subject: Re: Preliminary list of issues for defendants' Monday's submission

Ted, can you explain what you mean by #1?

Sent from my iPad

On Nov 2, 2012, at 8:46 PM, "Bennett, Edward" <EBennett@wc.com> wrote:

Christine – these are the issues defendants are considering raising in Monday's 10 a.m. submission. Of course, we may add others, or not press some of these, depending on events over the weekend, including what FHFA includes on its list. You asked me tonight to identify which defendants are pressing which issues. Because of the hour, and because the final positions of the parties are still coming to rest, I am unable to do so with certainty at this point. It should be clear from the Monday submission, however.

1. FHFA's business segment limitation
2. Custodian issues:
 - a. FHFA's refusal to add 10 key Fannie custodians:
 - i. Andrew BonSalle
 - ii. Rick Sorkin
 - iii. Tom Lund
 - iv. Bhanu Frueh
 - v. Timothy Judge
 - vi. Clinton Lively
 - vii. Jessica Yam
 - viii. Robert Ives
 - ix. Merritt Connell
 - x. David Benson

- b. FHFA's refusal to search Freddie CRO David Andrukonis' documents from January 1, 2004 until his firing in June 2005
3. Defendants' October 26, 2012 request re: FHFA's search terms
4. FHFA's refusal to search for documents related to the GSEs' sales of the at-issue Securitizations to third-parties
5. FHFA's refusal to provide information that would allow defendants to assess the appropriateness of FHFA's post-securitization custodians
6. Status report regarding ongoing discussions concerning expert discovery
7. Proposed modifications to the schedule

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From: Bennett, Edward

Sent: Friday, November 02, 2012 2:11 PM

To: Bennett, Edward; 'Christine Chung'; 'Shane, Penny'; 'Julia Beskin';

richardschirtzer@quinnemanuel.com; Ahmad, N. Mahmood

Cc: 'Shane, Penny'; 'alexander.drylewski'; 'allie.cheatham'; amichaelson@bsfllp.com;

'aturner'; 'battle'; 'bkarp'; 'Braff, David H.'; 'Brian.weinstein';

Bryan.Levine@skadden.com; Stewart, Beth; 'camaratac'; 'Castleman, David A.';

'CGrusauskas'; 'Clark, Bruce E.'; 'Daniel.schwartz'; 'Davidoff, Amanda Flug'; Blatt, David;

'Dehoney, David R.'; 'djames'; 'dmarshall'; 'DPotter'; 'dwooll'; dzinman@rkollp.com;

'Edelman, Theodore'; 'edlinr'; 'Frawley, Brian T.'; 'Fritsch, Joshua J.';

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LIT@mayerbrown.com; 'robert.fumerton'; 'rouhandeh'; 'sandra.hauser'; 'sbuerge'; Cady,

Steven; 'scott.musoff'; 'Scott, Jeffrey T.'; 'Sedlak, Jonathan M.';

seth.goodchild@weil.com; 'Sollors, David M.'; 'Tomaino Jr., Michael T.'; 'trice';

vernon.broderick@weil.com; 'Harsch, Bradley A.'; 'High, Tracy Richelle';

mbloom@cravath.com; 'mkasowitz'; 'htorres'; 'cjohnson'; 'MHanin'; 'kleung'; 'JDElicio';

'ASKlein'; 'CBecker'; 'HBrownstein'; 'ncohen'; 'Philippe Selendy'; 'Andrew Dunlap'; 'Sascha

Rand'; 'Manisha Sheth'; 'Adam Abensohn'; 'FHFA-QE'

Subject: FHFA RMBS Litigation - follow up on document production

Christine & Richard: Please see the attached correspondence.

Thanks

Ted

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From: Bennett, Edward

Sent: Saturday, October 13, 2012 2:31 PM

To: Christine Chung; Shane, Penny; Julia Beskin; richardschirtzer@quinnemanuel.com

Cc: Shane, Penny; alexander.drylewski; allie.cheatham; amichaelson@bsfllp.com;

aturner; battle; bkarp; Braff, David H.; Brian.weinstein; Bryan.Levine@skadden.com;

Stewart, Beth; camaratac; Castleman, David A.; CGrusauskas; Clark, Bruce E.; Daniel.schwartz; Davidoff, Amanda Flug; Blatt, David; Dehoney, David R.; djames; dmarshall; DPotter; dwoll; dzinman@rkollp.com; Edelman, Theodore; edlinr; Frawley, Brian T.; Fritsch, Joshua J.; george.zimmerman; greg.danilow; jane.morril; jay.kasner; JBurns@KRAMERLEVIN.com; jconnolly@rkollp.com; jhaims; McNichols, John; Smallwood, Jesse; jsneider@bsfillp.com; Klapper, Richard H.; Kleysteuber, Rudy; Idearcy; leftonr; lipps; moskowitz@cravath.com; michael.firestone@weil.com; mreynolds; nbinder@rkollp.com; Nelles, Sharon L.; nicholas.george; pamela.chepiga; patrick.fitzmaurice; Razza, Jordan T.; rclary; RMBS-LIT@mayerbrown.com; robert.fumerton; rouhandeh; sandra.hauser; sbuerge; Cady, Steven; scott.musoff; Scott, Jeffrey T.; Sedlak, Jonathan M.; seth.goodchild@weil.com; Sollors, David M.; Tomaino Jr., Michael T.; trice; vernon.broderick@weil.com; Harsch, Bradley A.; High, Tracy Richelle; mbloom@cravath.com; mkasowitz; htorres; cjohnson; MHanin; kleung; JDElicio; ASKlein; CBecker; HBrownstein; ncohen; Philippe Selendy; Andrew Dunlap; Sascha Rand; Manisha Sheth; Adam Abensohn; FHFA-QE

Subject: Documents relating to the GSEs' derivatives and hedging transactions

Christine and Richard – please see the attached correspondence.

All the best

Ted

Edward J. Bennett, Esq.

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